

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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JARRETT R. JENKINS,	:	
	:	
Plaintiff,	:	Case No.:
	:	
v.	:	
	:	
CONVERGENT OUTSOURCING, INC.	:	
	:	
Defendant.	:	
	:	
-----X	:	

NOTICE OF REMOVAL

COMES NOW Defendant, Convergent Outsourcing, Inc. ("Convergent"), and for Removal of the above-styled cause to this Court, respectfully states:

1. On or about June 1, 2015, an action was commenced against Defendant in the District Court of the County of Nassau, entitled *Jarrett Jenkins v. Convergent Outsourcing, Inc.* under Index No.: CV-007981-15. A copy of the Summons and Complaint therein were served on Defendant on June 3, 2015, via certified mail.

2. This Notice of Removal is being filed within 30 days of the date upon which Defendant received a copy of the Plaintiff's Complaint via certified mail.

3. A true and accurate copy of the Complaint in this case is attached hereto as Exhibit A.

4. Plaintiff's Complaint alleges that Plaintiff is an individual residing in West Hempstead, New York.

5. Defendant Convergent is a Washington company with its principal place of business in Renton, Washington.

6. The Complaint alleges the action is brought under the Fair Credit Reporting Act, 15 U.S.C. §1681(b). As such, this court has Federal Question jurisdiction over this action pursuant to 28 U.S.C. §1331.

7. This case is a civil action which may be removed to this Court by Defendant under the provisions of 28 USC §§1331 and 1441, in that Plaintiff alleges the controversy arises under 15 USC §1681(b).

8. Concurrently, Defendant has provided written notice of this Notice of Removal to Plaintiff, filing a copy with the District Court of the County of Nassau, as required by 28 U.S.C. §1446(d).

WHEREFORE, Defendant prays that the Court assume jurisdiction of this cause and proceed with it to completion, and to enter such orders and judgments as may be necessary to protect its jurisdiction or as justice may require.

Dated: June 30, 2015

THE SALVO LAW FIRM, P.C.

By: s/ Cindy D. Salvo
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